



August 3, 2021

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

Re: Zurich American Ins. vs. Challenge Warehousing, Inc.

Dear Sir/Madam:

This office represents the defendant in the litigation matter referenced above. Please allow this letter to serve as our formal public records request for copies of any inspections; citations; notices of violations, warnings, & fines; violations, warnings, & fines; response or appeal of violations, warnings, & fines; corrective actions suggested, ordered, and performed; and any testing, sampling, data, reports, communications with Niagara, and documents related to same for the referenced site and dates below.

19925 Independence Blvd.
Groveland, Florida
(Niagara Bottling- Warehouse)

2008 through 2016

Should you deny any part of this request, please state in writing the basis for the denial. Additionally, we ask that you please contact us for authorization prior to incurring any costs related to this inquiry equintero@torresvictor.com.

Your assistance in complying with this request is very much appreciated. Should you have any questions with regard to the foregoing, please do not hesitate to contact me.

Very truly yours,

Elizabeth Quintero

Elizabeth Quintero
Paralegal

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